

**Federal Defenders
OF NEW YORK, INC.**

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February 9, 2023

BY EMAIL

Honorable Jed S. Rakoff
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Steven Perez (Preferred name: Lucha El Libertad)
22 Cr. 644 (JSR)

Dear Judge Rakoff:

I write with the consent of the Government and the Pretrial Services Agency to respectfully request that the Court allow Mr. Lucha to leave his home tomorrow to attend the funeral services of a family member.

Mr. Lucha's cousin recently died. Funeral services will be held Friday, February 9, 2023, at RG Ortiz Funeral Home located at 524 Southern Blvd, The Bronx, NY 10455. The service will begin at 4:30 PM and end at 8:00 PM. I ask that Mr. Lucha be permitted to leave his home to attend this service, with reasonable travel time as determined by Pretrial.

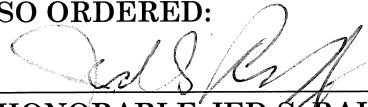
As the Court is aware, Mr. Lucha is currently on home detention which prohibits him from leaving the home for the funeral service absent an order from the Court.

As noted, both Pretrial and the Government consent to this request.

Respectfully submitted,
/s/ _____
Zawadi S. Baharanyi
Assistant Federal Defender
(917) 612-2753

cc: AUSA Ashley Nicolas
USPSO Jonathan Lettieri

SO ORDERED:



HONORABLE JED S. RAKOFF
United States District Judge